

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**QUANIAH R. STEVENSON,**

**Plaintiff,**

**vs.**

**DELTA AIR LINES, INC.,**

**Defendant.**

**Civil Action No.  
1:16-cv-2571-AT-LTW**

**DECLARATION OF KELLEY NABORS**

I, Kelley Nabors, declare under penalty of perjury that the following facts are within my personal knowledge and are true.

1. My name is Kelley Nabors. At all times referenced below, I worked for Delta Air Lines, Inc. (“Delta”) as a Manager in Delta’s Equal Opportunity Department.

2. As a valuable privilege of Delta employment, Delta provides its employees and certain of their family members and a designated travel companion with free and reduced-rate travel (also known as “Travel Passes”).

3. Delta also provides its employees with an additional pass travel benefit known as “buddy passes” which allows an employee to provide reduced-rate transportation to friends or family members who are not their designated travel companion.

4. Delta has written policies regarding its pass travel benefits, and periodically issues reminders to employees of the importance of complying with the policies regarding pass travel.

5. Among other things, Delta expressly prohibits the use of travel passes for anything other than leisure travel -- and specifically forbids their use for business travel. Business travel is an important source of revenue for Delta and for that reason Delta does not allow business travelers to utilize Delta passes and requires business travelers to buy a ticket on Delta. The prohibition on the use of travel passes for business travel is a well-known rule at Delta.

6. Delta also requires that its employees keep "control" of their passes and the passes of their designated companions, including by ensuring that the employee is aware of the travel being undertaken by their designated companion and that the pass travel is not for business or any other improper purposes. Delta employees are responsible for ensuring that their non-employee travel companions comply with these Delta and the other Delta policies relating to travel passes.

7. In approximately 2014, it came to Delta's attention that some of its employees were misusing their travel passes by, among other things, offering them for sale, using them for business purposes or allowing their designated travel companion to use them for business purposes. As a result, in April 2014, Delta issued a Memo and set of Frequently Asked Questions to its employees that again

reminded them of the rules and regulations surrounding the use of pass travel, including that such passes cannot be used for business purposes because such actions “are clear violations of the pass policy” and that employees are “responsible for knowing how [their] pass travel privileges are used” by their designated travel companions.

8. Delta’s April 2014 communication also informed employees that Delta was beginning an initiative known as the Fly Right campaign that was designed to ensure that pass travel abuse is stopped. Delta established a new group, known as the Pass Protection Group, “to work to proactively identify cases of possible abuse and investigate them thoroughly.”

9. Delta’s Pass Protection Group utilized a set of objective criteria or parameters to determine which employees would have their travel pass usage reviewed -- focusing on those employees and travel companions who had very high travel pass usage and those employees who shared “buddy passes” with individuals who had received buddy passes from a substantial number (at least 5) Delta employees.

10. In 2015, as part of the audit and based on objective criteria, Delta’s Pass Protection Group was investigating the pass travel of all employees who had shared “buddy passes” with an individual named Vendell Bailey (“Bailey”) who had received buddy passes from a number of different Delta employees including

Stevenson. Because Stevenson was one of the individuals who had provided travel passes to Bailey, Stevenson's travel pass records (like others who had provided passes to Bailey) were fully and carefully reviewed during the investigation.

11. In the course of the review of Stevenson's travel pass records, the Pass Protection Group identified information that showed that Stevenson's designated travel companion, Jovan Dais ("Dais") was traveling frequently, and to numerous disparate locations, in a way that reflected possible business travel. A true and correct copy of Mr. Dais' travel pass records from January 2014 to June 2015 are attached hereto as Exhibit A, and as is apparent from those records, Dais traveled frequently both during the week and during the weekends, at various times, often for short duration, to locations that included Los Angeles, Phoenix, New York, Houston, St. Louis, Pittsburgh, Dallas, New Orleans, Washington, D.C., San Francisco, New York, Orlando, Salt Lake City, Burlington, Vt., Cincinnati, Las Vegas and Detroit.

12. Further review of public and on-line records by the Pass Protection Group (including public postings by Dais attached hereto as Exhibit B) reflected that Dais was a producer and artist in the music business, and that on at least one of his trips using Stevenson's travel passes (a one-night trip to Los Angeles, California on June 6, 2015), Dais made the trip with a music artist with whom he

worked, Caleb Boyett for the purpose of Boyett engaging in a concert performance. Specifically, the records showed that, using Plaintiffs travel passes, Mr. Dais traveled with Mr. Boyett to Los Angeles on Friday June 6, 2015, performed in the show that day, and then they flew out the following day. The records also reflected that Mr. Dais and his work-partner, Mr. Boyett, had traveled together using Plaintiffs travel pass benefits on at least one other occasion (a trip to Houston, Texas). The records further reflected that Mr. Dais had paid Mr. Boyett's fees associated with Mr. Boyett traveling on Delta passes.

13. Based on the information gathered by a review of the Delta records and on-line documents, Ms. Stevenson was thereafter interviewed to address the records that indicated, among other things, that her travel benefits were being used by her travel companion (Mr. Dais) for his music business. The interview of Ms. Stevenson was conducted by a member of Delta's Pass Protection Group (Mehret Tafesse), a member of Human Resources (Kiha Jones), and a Delta Performance Leader (Francisco Cortes).

14. The interview was memorialized in a lengthy and detailed memo, written by meeting attendee and Pass Protection Group member Mehret Tafesse. A true and corrected copy of that memo is attached hereto as Exhibit C.

15. Tafesse's memo summarizing the interview of Stevenson, along with the other information gathered in connection with the investigation, was reviewed

by Delta Airport Customer Service Performance Leader Mark Harris, who then recommended to Station Manager Kelly Patton that Ms. Stevenson's employment be terminated. A true and correct copy of that recommendation is attached hereto as Exhibit D.

16. Station Manager Patton agreed with Performance Leader Harris' recommendation and thereafter, Delta Senior Manager - Human Resources, Barbara Franz, also reviewed the investigation materials and also concurred with the termination decision. Based on the finding that Ms. Stevenson had not maintained control over her travel passes used by her companion, Mr. Dais, and had allowed them to be improperly used for business purposes and had not been forthcoming in the interview, Ms. Stevenson's employment with Delta was terminated.

17. Ms. Stevenson was not the only individual terminated for misuse of travel benefits. Since the formation of the Pass Protection Group in 2014, numerous employees (including Caucasian, White, Hispanic and other employees, both male and female employees, and numerous individuals under the age of 40) have been terminated. This includes individuals who have made no allegation of discrimination, and no allegation that they suffer from any disability.

Executed this Fourth day of January, 2021.

Kelley Nabors  
KELLEY NABORS

# **EXHIBIT A**

Sluss, Ansley

**From:** Langel, Ryan D  
**Sent:** Saturday, January 02, 2016 2:42 PM  
**To:** Sluss, Ansley  
**Subject:** FW: Flight History

See below.

Ryan D. Langel  
 Special Counsel  
 Delta Air Lines, Inc. – Law Department

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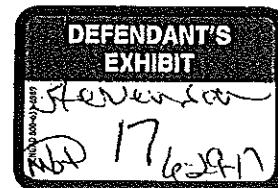
-----Original Message-----

From: esc@delta.com [mailto:esc@delta.com]  
 Sent: Saturday, January 02, 2016 2:42 PM  
 To: Langel, Ryan D  
 Subject: Flight History

\*\*\* DO NOT REPLY TO THIS EMAIL \*\*\*

Last 24 Months Flight History For DAIS,JOVAN J

Depart Date	Flt #	ORIG	DEST	Pass/Charge Type	Total Charges
06/08/2015	1446	PHX	ATL	Domestic	0.00
06/07/2015	0730	LAX	PHX	Domestic	0.00
06/06/2015	1755	ATL	LAX	Domestic	0.00
03/11/2015	1554	LAX	ATL	Domestic	0.00
03/05/2015	1094	ATL	LAX	Domestic	0.00
01/16/2015	1554	LAX	ATL	Domestic	0.00
01/13/2015	2355	ATL	LAX	Domestic	0.00
12/07/2014	5130	HPN	ATL	Transoceanic	0.00
12/06/2014	5146	ATL	HPN	Transoceanic	0.00
12/04/2014	1617	HOU	ATL	Domestic	0.00
12/03/2014	1064	ATL	HOU	Domestic	0.00
11/25/2014	1554	LAX	ATL	Domestic	0.00
11/18/2014	2055	ATL	LAX	Domestic	0.00
10/27/2014	1080	STL	ATL	Domestic	0.00
10/26/2014	1423	ATL	STL	Domestic	0.00
10/25/2014	1554	LAX	ATL	Domestic	0.00
10/22/2014	2355	ATL	LAX	Domestic	0.00
10/13/2014	1549	HOU	ATL	Domestic	0.00
10/04/2014	0754	PIT	ATL	Domestic	0.00



10/02/2014	1365	ATL	PIT	Domestic	0.00
09/15/2014	1454	LAX	ATL	Domestic	0.00
09/09/2014	0110	ATL	LAX	Domestic	0.00
09/07/2014	1810	DFW	ATL	Domestic	0.00
09/06/2014	1711	ATL	DFW	Domestic	0.00
08/31/2014	1654	LAX	ATL	Priority	0.00
08/24/2014	6437	SFO	LAX	Domestic	0.00
08/21/2014	1255	ATL	LAX	Domestic	0.00
08/18/2014	0176	DFW	ATL	Domestic	0.00
08/15/2014	1810	ATL	IAH	Domestic	0.00
08/15/2014	0775	MSY	ATL	Domestic	0.00
08/13/2014	1325	LAX	MSY	Domestic	0.00
08/12/2014	1060	MCO	LAX	Domestic	0.00
07/28/2014	0986	ATL	LGA	Domestic	0.00
07/28/2014	0672	CLE	ATL	Domestic	0.00
07/22/2014	0629	ATL	DTW	Domestic	0.00
07/14/2014	1354	LAX	ATL	Domestic	0.00
07/08/2014	1435	ATL	LAX	Domestic	0.00
07/01/2014	1454	LAX	ATL	Domestic	0.00
06/23/2014	4794	PHX	LAX	Domestic	0.00
06/23/2014	1772	ATL	PHX	Domestic	0.00
06/19/2014	2234	LAX	ATL	Domestic	0.00
06/17/2014	0081	ATL	LAX	Domestic	0.00
06/13/2014	2234	LAX	ATL	Domestic	0.00
06/10/2014	1169	MIA	LAX	Domestic	0.00
06/07/2014	1982	LGA	MIA	Domestic	0.00
06/05/2014	1286	ATL	LGA	Domestic	0.00
06/04/2014	4569	BUR	SLC	Domestic	0.00
06/04/2014	1222	SLC	ATL	Transoceanic	0.00
06/02/2014	2255	ATL	LAX	Domestic	0.00
06/01/2014	0386	RIC	ATL	Domestic	0.00
05/31/2014	2399	ATL	RIC	Domestic	0.00
05/30/2014	1818	MCO	ATL	Domestic	0.00
05/27/2014	0883	LAX	MCO	Domestic	0.00
05/14/2014	2204	LAX	SLC	Transoceanic	0.00
05/14/2014	1222	SLC	ATL	Transoceanic	0.00
05/05/2014	1577	MSY	LAX	Priority	0.00
05/03/2014	4667	LAX	LAS	Domestic	0.00
04/24/2014	3303	IAH	CVG	Transoceanic	0.00
04/24/2014	2469	CVG	ATL	Transoceanic	0.00
04/22/2014	1142	ATL	HOU	Domestic	0.00
04/16/2014	1554	LAX	ATL	Domestic	0.00
04/05/2014	2355	ATL	LAX	Priority	0.00
04/04/2014	1654	LAX	ATL	Domestic	0.00
03/29/2014	1076	ATL	LAX	Domestic	0.00
03/25/2014	1969	LAX	ATL	Priority	0.00
03/24/2014	0110	ATL	LAX	Domestic	0.00
03/20/2014	1254	LAX	ATL	Domestic	0.00
02/24/2014	1555	ATL	LAX	Domestic	0.00
02/21/2014	1354	LAX	ATL	Priority	0.00
02/17/2014	2355	ATL	LAX	Domestic	0.00
02/16/2014	1654	LAX	ATL	Priority	0.00

01/23/2014 4916 HPN ATL Domestic 0.00

01/21/2014 5366 ATL HPN Domestic 0.00

Last 24 Months Imputed Trip History For DAIS,JOVAN J

Trip Date Flt # ORIG DEST Payment Imputed Wage Imputed Val Eff Date Report Date

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# **EXHIBIT B**

6/15/2015

JOVAN DAIS (@jovandais) | Twitter

The image shows the Twitter login screen. On the left is a placeholder profile picture of a man with a beard. To the right is a large, stylized 'D' logo, which is the Twitter bird icon. Below the logo is the text 'Have an account? Log in ▾'.

 <b>JOVAN D...</b> @jovandais	<b>TWEETS</b> 5,389	<b>FOLLOWING</b> 1,729	<b>FOLLOWER</b> 7,411	
	<b>FAVORITES</b> 3	<b>LISTS</b> 1	<a href="#">Tweets</a>	<a href="#">Tweets &amp; replies</a>
<b>JOVAN DAIS</b> @jovandais			<a href="#">Photos &amp; videos</a>	
<a href="#">booking/features; nodaisoff@gmail.com</a>				
 <b>GODS GREEN EARTH</b> <a href="#">facebook.com/mndais</a> Joined December 2008			 <b>JOVAN DAIS @jovandais</b> · Jun 12 Baby girl getting better behind the wheel... riding with my oldest listening to who else???. . . <a href="#">instagram.com/p/32Yvg4LTYF/</a>	   
 <b>553 Photos and videos</b>      			 <b>JOVAN DAIS @jovandais</b> · Jun 8 S/O 2 my daughter @iamaleacea for being fearless abt going after her dreams.... thnx 2 @v103atlanta... <a href="#">instagram.com/p/3rtczjrTRU/</a>	   
			 <b>JOVAN DAIS retweeted</b> <b>#SLICK @BIGOOH</b> · Jun 7 "We Done Came a Long Way, --> Still We Got So Far 2 Go !!"- @jovandais <a href="#">instagram.com/p/3pVQCgM-qO/</a>	   
			 <b>JOVAN DAIS retweeted</b> <b>JIN@jusjino</b> · Jun 6 ON SOME L.A. SHIT WITH @jovandais Top Down On The Highway Headed to my Show in Bakersfield with @tyga... <a href="#">instagram.com/p/3nD2qLnP55/</a>	   
<b>DEFENDANT'S EXHIBIT</b> <i>stevenson</i> <i>NP 16 6-29-17</i>			 <b>JOVAN DAIS @jovandais</b> · Jun 6 We out!!! @jusjino @jspoolz #goingback2cali #dutycalls #beecherboys #nodaisoff <a href="#">instagram.com/p/3mGswnLTTy/</a>	   
			 <b>JOVAN DAIS @jovandais</b> · May 31 On Set with @theggsband new video "On & On" coming soon!! Thanxx 2 @nachishairsalon leimaje... <a href="#">instagram.com/p/3XeNVqrTW3/</a>	   

<https://twitter.com/lovandois>

6/15/2015

JOVAN DAIS (@jovandaits) | Twitter

JOVAN DÁIS @jovandais · May 27

REPOST FROM @iamaleacea:

"Make sure yall come out , new music , new show , new outfits . this...  
[instagram.com/p/3MHD3iLTQo/](https://www.instagram.com/p/3MHD3iLTQo/)

◎ 俗文化研究

JOVAN DAIS @jovandais · May 26

inkchink getting it in!!!! @theeggsband video shoot for "On & On"

@bemoremedia #theeggsband #beecherboys

[instagram.com/b/3KB0pXrTWT/](https://instagram.com/b/3KB0pXrTWT/)

卷之三

A square seal impression in red ink, featuring a stylized dragon or cloud pattern, positioned in the top right corner of the page.

JOVAN DAIS @jovandaits · May 24

On the set with @bemoremedia shooting "i know" off @jusjino new album!!! "Jus Jino" hosted by...

[instagram.com/p/3Fgd1OrTQ8/](https://www.instagram.com/p/3Fgd1OrTQ8/)

卷之二

三

JOVAN DAIS @jovandais · May 2023

REPOST FROM @jusjino:

"Abt last nite!!! S/O 2 everyone tht came out to @ctrlalt 2 represent wit... [instagram.com/p/27gr-zrTSR/](https://instagram.com/p/27gr-zrTSR/)

6/15/2015

JOVAN DAIS (@jovandais) | Twitter

#beecherboys #nodaisoff instagram.com/p/2uZn\_ArTUF/

JOVAN DAIS retweeted

#HotRunShdy Hot 963 @Hot963 · May 14

#NP @JSPOOLZ feat @wizkhalifa @jovandais SMOKIN GOOD On  
The #NEWAT10 with @CoachRedd & @Bswift317

JOVAN DAIS retweeted

JIN© @jusjino · May 14

They Build To Destroy.... But I Was Built To Last... Fl. @jovandais  
#JusJino #NoDaisOff #BeecherBoys instagram.com/p/2qq41LHP78/  
JOVAN DAIS @jovandais · May 14

REPOST FROM @jusjino:

"They Build To Destroy.... But I Was Built To Last... Fl. @jovandais  
#JusJino... instagram.com/p/2qq41LHP78/

JOVAN DAIS @jovandais · May 14

REPOST FROM @jusjino:

"They Build To Destroy.... But I Was Built To Last... Fl. @jovandais

#JusJino... instagram.com/p/2qq41LHP78/

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timeline!

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Refresh

juliennews.it  
@julieitalia

T-Town Pro...  
@Itownprod

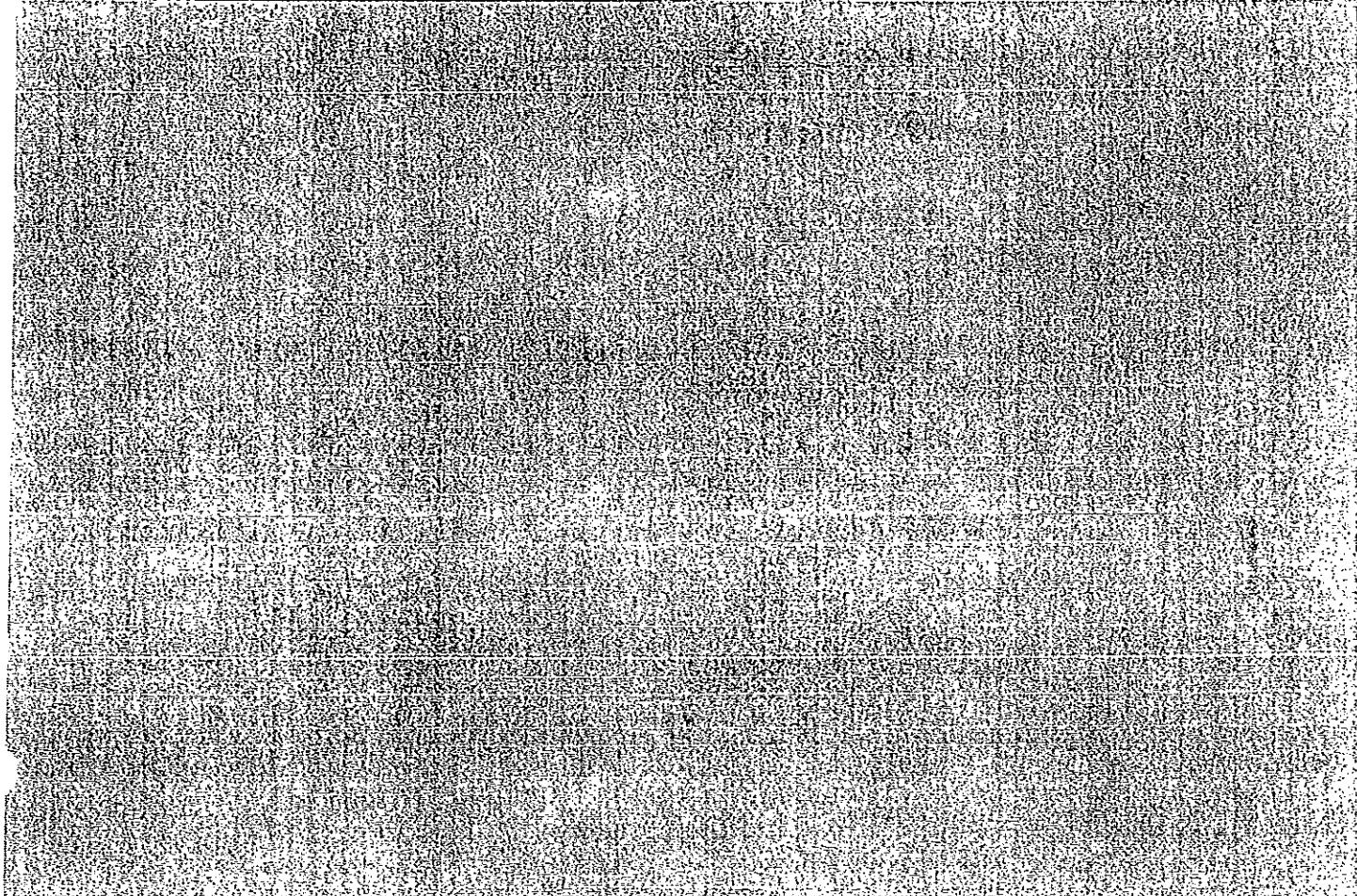
Blogs Daddy  
@BlogsDaddy

MONEY CA...  
 @\_MoneyCarlo

a bad think  
@abaddthink

## Trends

#qanda  
#iamdefensesquad  
#PSYCasaCorazon  
#MagnaCarta  
Jeremy Corbyn  
#AstroDmSpree  
Jack Greatsh  
#MondayMotivation



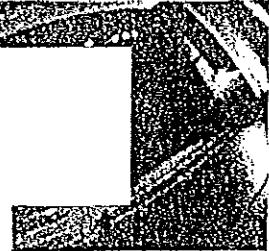
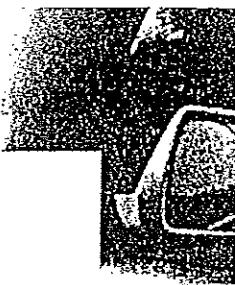
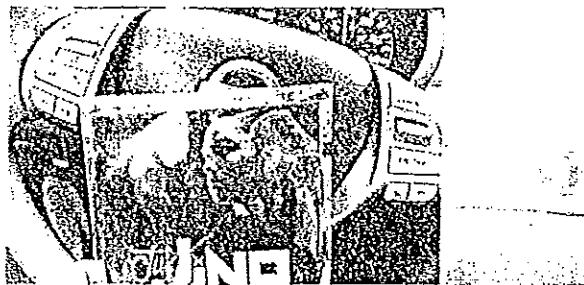
6/13/2020 9:39:39

Instagram™

ethiopian\_p Log out

#beecherboys

522 posts



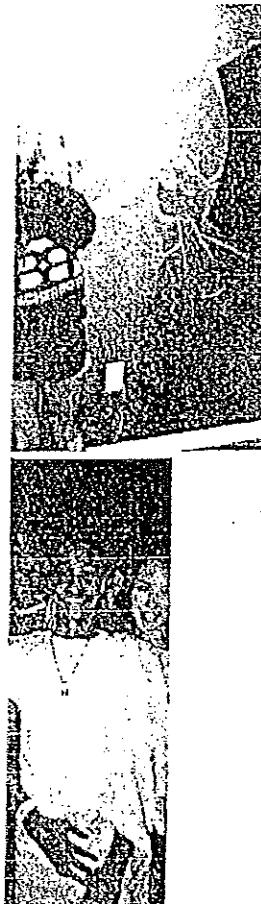
jusjino

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ENTERTAINMENT PRESENTS:



PERFORMING LIVE IN CONCERT  
JUNE 11TH 2011  
SPECIAL GUEST PERFORMANCE BY KAY COY  
AT THE FOX THEATER  
2001 HISTORIC KELLOGG AVENUE



6/15/2015

Instagram

37 likes

1w

jusjino Tonight I'm opening for @kinggoldchains in California!  
#NODAISOFF #BEECHERBOYS #JUSJINO #LastKings

ro\_akin Congrats bro !

ayyodezi congrats Caleb !! 🎉🎉🎉🎉

buckcitynow Yea nigga get it remember you the headliner

guitarboymusic1 Yeazirrrr Docta!!!! @jusjino

an\_jello Do work kid 💯

demetriasampsonbolar Who's up next? Not you youngin. You up  
NOW!

santimars\_ Congrats man

missjamaica300 Definitely need a mixtape ! Been listening to it all  
week 🎉 #proud & congrats homie



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6/15/2015

JOVAN DAIS (@jovandais) | Twitter

Gilas Cadets  
#WorldMeatFreeDay

20:5 Twitter About Help Ads info

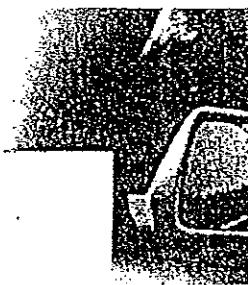
8/15/2015

Instagram

ethiopian\_p Log out

#beecherboys

522 posts



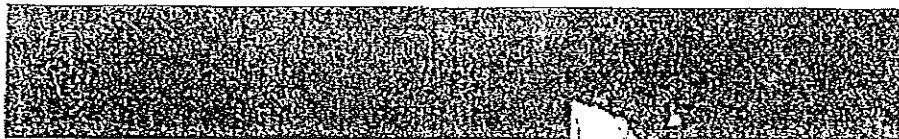
jusjino

[FOLLOW](#)



6/15/2015

Instagram



52 likes

1w

jusjino ON SOME L.A. SHIT WITH @therealjovanda is Top Down On  
The Highway Headed to my Show in Bakersfield with @kinggoldchains  
#NODAISOFF #BEECHEROYS #JUSJINO #LastKings

isisrahgawd Bruh u got more hair then me!!



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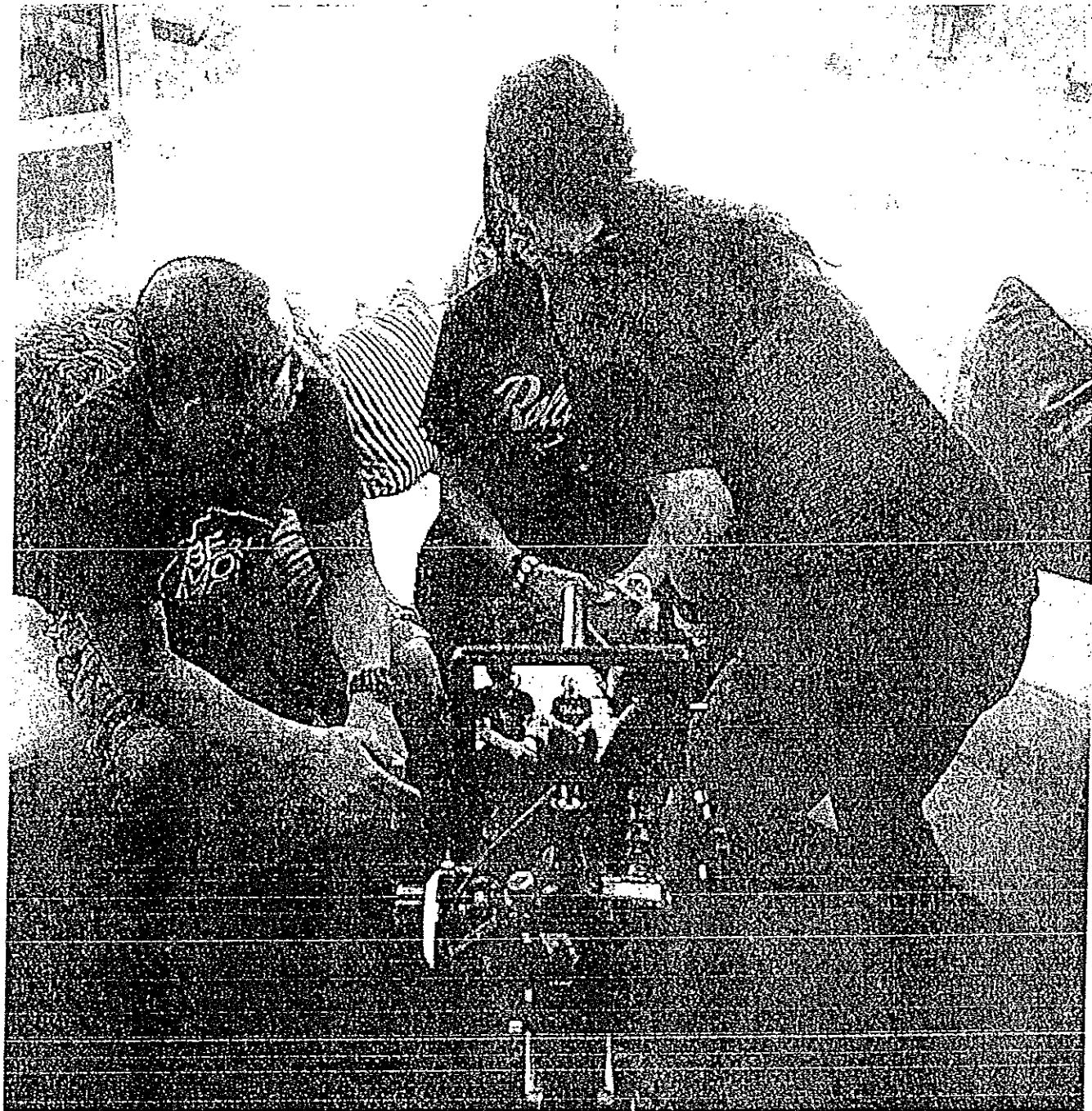
6/15/2015 Jovan Dais on Instagram: "On the set with @jusjino @bemoremmedia #New music "Jus Jino" 3.16.15 #californiavideoshoot #jusjino #beecherboys #nodai..."

ethiopian\_p Log out



therealjovandais

**FOLLOW**



16 likes

14w

[https://instagram.com/p/0A\\_xZzLTX8/](https://instagram.com/p/0A_xZzLTX8/)

1/2

6/15/2015 Jovan Dais on Instagram: "On the set with @jusjino @bemoremedia #New music "Jus Jino" 3.16.15 #californiavideoshoot #jusjino #beecherboys #nodai..."

therealjovandais On the set with @jusjino @bemoremedia #New music "Jus Jino" 3.16.15  
#californiavideoshoot #jusjino #beecherboys #nodaioff

Add a comment...

ABOUT US SUPPORT BLOG PRESS API JOBS PRIVACY TERMS

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6/15/2015

Jovan Dais on Instagram: "See ya boi @jusjino live!! current sxsw dates more added soon!! #jusjino #beecherboys #nodaisoff #VelvWorks"

therealjovandais See ya boi @jusjino live!! current sxsw dates more added soon!! #jusjino #beecherboys #nodaisoff #VelvWorks

kiyanatakemeaway LIT!!!! 🎉, I'm coming

thequeenraquellee @skratchandscratches

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6/15/2015

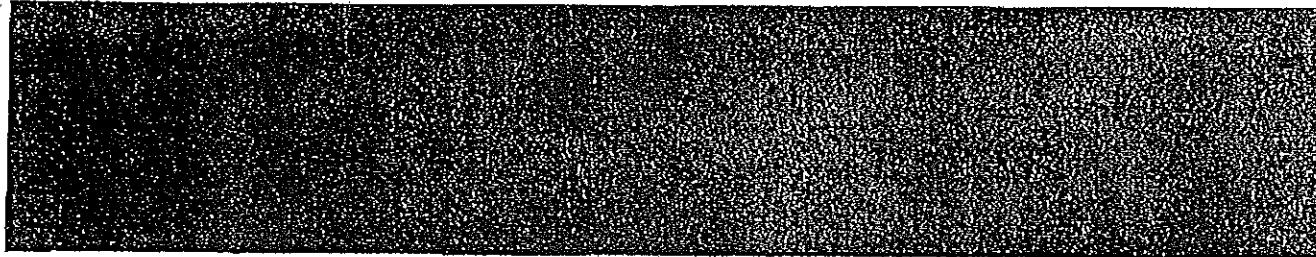
Jovan Dais on Instagram: "See ya boi @jusjino live!! current sxsw dates more added soon!! #jusjino #beecherboys #nodaisoff #VelvWorks"

ethiopian\_p... Log out



therealjovandais

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## **SXSW 2015**

**Thursday, March 19th 12PM - 6PM**

**#LightTheTorch**

**KRAVE 302 E. 6th St.**



**Friday, March 20th 6PM - 2AM**

**#HipHopNHipsters**

**Victory Grill 1104 E. 11th St.**

**Friday, March 20th 7PM - 2AM**

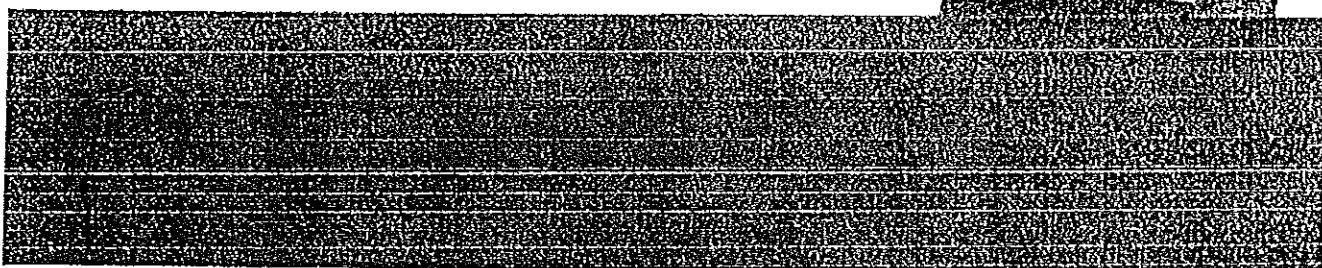
**#ZoolyGvng Official SXSW Stage**

**405 Club 405 E. 7th St.**

**Saturday, March 21st 9PM - 3AM**

**#TrapHouseParty**

**Location TBA**



14 likes

13w

# **EXHIBIT C**



July 6, 2015

Pass Protection Group Audit  
Investigation Summary

Re: Quaniah Stevenson  
Employee number: 689688  
DOH: 08/01/07  
Station/Dept. ATL/125

Present for interview:  
Francisco Cortes – Performance Leader  
Kiha Jones – HR Manager  
Mehret Tafesse – PPG (writer)

**Background:**

Quaniah was being interviewed because she shares buddy pass rider Vendell Bailey with other Delta employees Ernest Adams (DTW/120), Brady Nicholson (DTW/120), Candice Dubois (ATL/125), and Sirdarius Johnson (ATL/125).

Quaniah was asked to verify everyone who is in her PPR:

- Quinten Stévenson- Quaniah said he is her father, she was able to verify his DOB and where he traveled.
- Tassie-Carter-Stevenson-Tow- Quaniah said Tassie is her mother, she was able to verify her DOB and where she traveled.
- Joann Stevenson- Quaniah said Joann is her step mother and is married to her father Quinten. She was able to verify where Joann traveled.
- Jovan Dais- Quaniah's current companion add on 08/01/11. When asked how long she has known Jovan, Quaniah said about 15 years. Quaniah stated that Jovan is her boyfriend. When asked where he lives, Quaniah said 2360 Barrington Trace Circle, Camp Creek area.
- When asked where Jovan works, Quaniah said Jovan is a musician and works for Another Days Worldwide.
- Our research shows, Jovan address 2360 Barrington Trace circle is used as home and business address. Jovan business is spelled as Anotha Dais Worldwide. Anotha Dais is music production, studio rentals, recording services-sound & video, and equipment rentals.
- When asked places Jovan traveled, Quaniah said LAX, PHX, and MIA. When asked when the last time Jovan traveled, Quaniah said about 3 weeks ago to California.
- When asked who books Jovan's flights, Quaniah said she does. When asked if she books all of his flights, Quaniah said sometimes she books his flights at his house on his computer and the computer could save her password.
- Our research shows Jovan traveled to LAX, PHX, HPN, HOU, STL, PIT, DFW, IAH, MSY, SFO, MCO, LGA, SLC, BUR, CVG, LAS, and DTW.

- When asked if they have traveled together, Quaniah said yes. When asked when they traveled together, Quaniah said they traveled to LAX for a funeral. Explained to Quaniah that she and her family traveled to LAX using S1 family emergency pass on April 16, 2015 returning on April 20, 2015. Jovan traveled to LAX March 5 and June 6, 2015. Quaniah then said she never said they traveled together. Kiha Jones HR manager said to Quaniah that she just mentioned they traveled together in April for the funeral. Quaniah said they have traveled together but not for the funeral. When asked again when they traveled together, Quaniah said they traveled together before in the past.
- Our records does not show Quaniah and Jovan traveling together since he has been added to her companion pass.
- When asked the purpose of Jovan traveling to LAX frequently, Quaniah said Jovan children live in LA. Quaniah also said they both have family who lives in LA.
- When asked Jovan's Twitter and Instagram post on June 6, 2015 about being in Cali for a performance at Baskerville, CA opening up for the rapper Tiger, Quaniah said she didn't know anything about that. Quaniah said Jovan was not performing and it was his friend that was performing at Baskerville, CA.
- Our research shows Jovan and his friend/artist Caleb Boyett traveled on June 6, 2015 to perform at a show in Baskerville, CA. We have Instagram pictures and videos that shows both of them going to perform at this event. Jovan and Caleb also traveled in March to LAX and PHX together. They traveled in September of 2014 to LAX as well. Every time they travel together, Jovan pays for the buddy pass taxes for Caleb.
- Christopher Blanding- Quaniah's previous companion from 07/31/09 to 07/30/11. Quaniah said Christopher is a friend of hers who lives in Miami, FL. When asked where Christopher works, Quaniah said he is a music producer.

Buddy Passes:

- Andre Grimes- traveled from MSP to MOT (Minot, North Dakota) connection through ATL in February 2015. Quaniah said he is a friend of hers. Quaniah said he traveled from ATL to South Dakota.
- Caleb Boyett- traveled on two buddy passes. In October 2014, Caleb traveled from HOU to ATL to LAX and in September 2014, Caleb traveled from ATL to LAX. Both times he traveled with Quaniah's companion Jovan. Jovan paid for the buddy pass taxes.
- Quaniah stated that Caleb is both of their friend. When asked why Jovan paid for Caleb taxes, Quaniah said Caleb is young. Caleb is 22 years old born in 1993. Caleb also traveled to LAX with Jovan in June 2015 but on another DL employee Adebawale Davies (ATG/345). Jovan paid for his taxes again.
- Oscar Dais- traveled from HPN to ATL in December 2014. Quaniah said Oscar is Jovan's father. Jovan also paid for Oscar buddy pass taxes.
- Rodney Turner- traveled from DFW to ATL in August 2014. Quaniah said Rodney is her friend Tawanga husband. Quaniah said he traveled from DC or Ohio.
- Dianne Munroe- traveled from ATL to HPN in October 2014. Quaniah said Dianne is her father friend. She was able to verify where Dianne traveled.
- Sean Fenton- traveled from LAX to ATL in August 2014. Quaniah said Sean is Jovan's friend. Quaniah was able to verify where Sean traveled.
- Vendell Bailey- has traveled on four other Delta employees buddy passes in 2012. Quaniah was not able to verify who Vendell is but she did verify where she traveled. Vendell traveled from DTW to ATL in September 2012.

**Findings:**

- Quaniah was not truthful and forthcoming about her current companion pass rider Jovan Dias. Quaniah was not able to verify all the places Jovan traveled. Quaniah also stated that she and Jovan traveled together in 2015 and previous years.
- Our records does not show Quaniah and her companion Jovan traveling together in 2015 and in previous years.
- Our research shows, Jovan owns Anotha Dais Worldwide. The address is 2360 Barrington Trace circle is used as home and business address. Anotha Dais is music production, studio rentals, recording services-sound & video, and equipment rentals.
- Our research also shows Jovan traveled to LAX, PHX, HPN, HOU, STL, PIT, DFW, IAH, MSY, SFO, MCO, LGA, SLC, BUR, CVG, LAS, and DTW. Quaniah verified three places he traveled which is LAX, PHX, and MIA.
- Jovan posted on Twitter and Instagram on June 6, 2015 about being in Cali for a performance at Baskerville, CA opening up for the rapper Tiger, Quaniah said she didn't know anything about that. Quaniah said Jovan was not performing and it was his friend that was performing at Baskerville, CA.
- Our research shows Jovan and his friend/artist Caleb Boyett traveled on June 6, 2015 to perform at a show in Baskerville, CA. We have Instagram pictures and videos about both of them going to perform at this event. Jovan and Caleb also traveled in March to LAX and PHX together. They traveled in September of 2014 to LAX too. Every time they travel together, Jovan pays for the buddy pass taxes for Caleb.
- Caleb Boyett- traveled on two buddy passes. In October 2014 Caleb traveled from HOU to ATL to LAX and in September 2014 Caleb traveled from ATL to LAX. Both times, he traveled with Quaniah's companion Jovan. Jovan paid for the buddy pass taxes. Quaniah stated that Caleb is both of their friend. When asked why Jovan paid for Caleb taxes, Quaniah said Caleb is young. Caleb is 22 years old born in 1993. Caleb also traveled to LAX with Jovan in June 2015 but on another DL employee Adebawale Davies (ATG/345). Jovan paid for his taxes again.
- Quaniah said she doesn't remember buddy pass rider Vendell Bailey who traveled on four other Delta employees buddy passes.

# **EXHIBIT D**



Delta Air Lines, Inc.

# MEMO

To: Kelly Patton, Station Manager – ACS/125  
Atlanta Worldport – Concourse E

From: Mark Harris, Performance Leader – ACS/125  
Atlanta Worldport – Concourse E

Date: July 16, 2015

Subject: Recommendation for Termination of Employment  
Quaniah Stevenson, EE#689688, CSA - ATL/E-Ticket counter

I am recommending termination of employment for PT Agent, Quaniah Stevenson for violation of pass travel policies. Ms. Stevenson was not forthcoming regarding her current companion and his travel. During the investigation led by Equal Opportunity (EO), she could not provide his places of travel. Research by EO indicates her companion used non-revenue benefits for business purposes as his Twitter and Instagram pages substantiated travel and the dates matched our Delta flight records.

Ms. Stevenson was given the opportunity to provide documentation to support her statement regarding her companions' travel being paid by his employer/vendors, however, no data was submitted.

Research also shows a buddy rider travelled twice with her companion for business purposes as social media confirmed the travel.

Since Ms. Stevenson's date of employment, August 07, 2007, she has received warning(s) on the following occasion(s):

04/03/2015 Journal Entry- Attendance/Reliability  
03/07/2015 Journal Entry- Coaching- Uniform Guidelines

Due to Ms. Stevenson's violation of pass travel policies, I am recommending termination of her employment with Delta Air Lines.

Mark Harris, Performance Leader – ACS/125  
Atlanta Worldport, Concourse E

I concur with this recommendation for termination.

Kelly Patton, Station Manager - ACS/125  
Atlanta Worldport - Concourse E